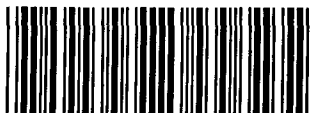


DRAFT

Westbank Asbestos Removal Project  
SPECIAL SITES

| SITE                                                                                     | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Recommendation                                                                                                                                                                                                                                                             |
|------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Drive-in theater<br>Marrero<br>①                                                         | 6.2 acre field bounded by residential streets to the north & west, a canal to the east, and by the WB Exwy's access road to the south. Largely overgrown w/ grass but there are several areas of surface ACM (SACM). Only apparent site activities are the brush hogging and a realtor's "for Sale" sign.                                                                                                                                                                                                                                                           | Notify the owner/realty of the potential liability and regulatory concerns. If any EPA action, cover the SACM with geo-liner and sand.                                                                                                                                     |
| LaPalco Landfill<br>Westwego<br>②<br><i>May be another part of LF across the street.</i> | A former city dump that accepted construction debris and JM wastes(?). Bounded by drainage ditch and LaPalco Blvd to the north, a drainage canal to the west & south, and a residential area to the far east. The site is mostly heavily wooded and overgrown. The Parish mows the Lapalco ditch where there used to be visible ACM debris. But more recently, the OSC and LDEQ couldn't find except very little visible ACM.                                                                                                                                       | LDEQ said that they would recommend to the Parish maintenance crews to avoid mowing the areas of visible ACM at the LF. The visible areas could also be covered with geo-liner and sand.                                                                                   |
| Johns-Manville<br>Landfill<br>Marrero<br>③                                               | Appr. 2 acre site of mostly SACM near/on the former JM plant. Evidence of site activities as there are no restrictive barriers to the public. Much of the ACM is very friable. Across 4 <sup>th</sup> st to the south, are residential areas. This may have been the area that the waste ACM was stored for public give-away. Immediately adjacent to this area is a open field w/ SACM. The field is maintained/mow by Lowery Cable which owns/leases the property formerly part of JM. Part of this area is used for parking by customers of a convenience store. | Persuade JM (discussion, order, NESHAPS) to cover the LF and restrict access, post signs according to NESHAPS reg for asbestos landfills.<br><br>Address the parking area. This may be the Parish's RoW. Lowery/JM should maintain the other area as a "psuedo" NESHAP LF. |
| Trailer Park<br>Gretna                                                                   | A sixteen unit trailer park with a very large volume of ACM w/in the top six inches of the surface. Much of the ACM is covered w/ 2-5 inches of shells.                                                                                                                                                                                                                                                                                                                                                                                                             | <del>Check the financial viability of the park's owner. We should only remove the SACM and "cover" w/ limestone.</del><br><i>make schedule for removal</i>                                                                                                                 |

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*These 3  
I gave  
a copy of  
Site sketch  
to JM*

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| (CONTINUE)<br>SITE                                     | Description                                                                                                                                                                                                                                               | Recommendation                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Levee Landfill<br>Marrero<br>④                         | Disposal area utilized by JM during its operation. The ACM is reportedly the dried-up slurry released into the river. The LF is on the river side of the levee (COE maintained).                                                                          | LDEQ has persuaded JM to maintain the LF as regulated under NESHAPS.                                                                                                                                                                                                                                                                 |
| Catholic driveway<br>Harvey                            | Hasn't been sketched but the potential area of ACM could be the 1000 feet of driveway that circles the back portion of the property to an old gym. It may not be currently used. The property is operated by the Catholic church for wayward kids.        | Excavate six inches of ACM, geo-line, and put limestone back. Coordinate w/ the church officials closely. Send response letter to their indemnification request.                                                                                                                                                                     |
| Golf Course<br>Gretna<br>⑤                             | Timberlane Country Club is open for public access. There are a couple of SACM areas on the back nine's cart paths. Most serious is a large area near the restroom. Residential properties surround the golf course.                                       | Notify the TCC & LDEQ of TCC's responsibility to address the SACM. (Since this may be a very real financial hardship to them, we could "negotiate" a response where they perform restoration & pay disposal cost while we perform the excavation and transportation.                                                                 |
| OTHER (under<br>houses & inside<br>garages/sheds)<br>⑥ | We conducted one air sampling (01/27/97) event under a residence that we considered to be the worst case (very powdery, children, near a day-care). The 5 sample results came back non-detect TEM (below 0.0011 asbestos structures/cc).<br><del>II</del> | Provide the citizens, local HD, & the Parish w/ a fact sheet indicating proper hygiene while encountering asbestos "in" the home.<br>Researching encapsulation has not been fruit-full thus far. Ask ERT and/or JM for their expertise. Perhaps demonstrate effectiveness on just a couple of sites before recommending encapsulant. |

They have yet to respond back.

I + may take awhile to get \$s of properties (Probably need to re-survey)

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| (CONTINUE)<br>SITES                     | Description                                                                                                                                                                                                                                                                                                                                                                | Recommendation                                                                                                                                                                                                                                                          |
|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| OTHER (the Parish and their workers)    | LDEQ & I have continued to emphasize to the Parish/city on their responsibility to their workers & public b/c they will encounter the ACM their routine maintenance operations. The last meeting we went through the proper notifications of the State's NESHAPS reg. They seemed on-board but I don't think they will take our strong recommendation to train inspectors. | Leave the issue as it stands w/ LDEQ the proper regulatory overseer.<br><i>EPA is actually supposed to enforce OSHA regs of State, local &amp; volunteers not covered by OSHA. I don't know of any EPA Enf. mechanism for OSHA issues, except under NCP activities.</i> |
| Institutionalize the property's address | I tentatively planned to give the Parish and the local digging authority for utilities companies (DOTI) a CD copy of all pertinent site files. But like the LDEQ, the Parish doesn't want to touch for mostly liability reasons. The Parish suggested we do as they do, notify the property owner of their legal responsibility to put against their property deed.        | I planned to send out comfort letters to all the properties addressed or inspected during this project but we need to carefully consider the legal ramifications of what WE do to "institutionalize".                                                                   |

02/20  
QES's last day  
this phase

02/25  
Remob after  
Mardi Gras wkend  
Work on restoration  
& survey  
  
(110 sites)

03/09  
IT ready to excavate  
(2 crews @ 10 sites/wk)  
Survey completed  
PRESS RELEASE  
  
(? sites/survey 80% confidence)  
(Project 190 more + 110 = 300)

04/01  
Inspection release  
deadline  
w/ exact # of sites  
evaluate sub options

JUNE ?  
PROJECT  
COMPLETE

(260 sites in three months)  
(plus special sites)

May consider picking a demob date and return 6 mos later to complete but we not have command post facility.